

**FILED**

APR 08 2021

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**JESSICA LEVON MCBRIDE,**

**Defendant.**

**Case No. ~~21~~CR161CVE**

**INDICTMENT**

**[COUNT 1: 18 U.S.C. §§ 1151,  
1152, and 1111 – Second Degree  
Murder in Indian Country;**

**COUNT 2: 18 U.S.C. §§ 1151,  
1152, and 81 – Arson in Indian  
Country;**

**COUNT 3: 18 U.S.C. § 1512(c)(1) –  
Corruptly Attempting to Alter,  
Destroy, Mutilate, and Conceal an  
Object to Impair its Use in an  
Official Proceeding;**

**COUNT 4: 18 U.S.C. §§ 1151,  
1152, and 81 – Attempt to Commit  
Arson in Indian Country]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[18 U.S.C. §§ 1151, 1152, and 1111]**

On or about March 17, 2019, within Indian Country in the Northern District of Oklahoma, the defendant, **JESSICA LEVON MCBRIDE**, a non-Indian, did unlawfully kill Tracy Elaine Russell, an Indian female, with malice aforethought by strangulation.

All in violation of Title 18, United States Code, Sections 1151, 1152, and 1111.

**COUNT TWO**  
**[18 U.S.C. §§ 1151, 1152, and 81]**

On or about March 17, 2019, within Indian Country in the Northern District of Oklahoma, the defendant, **JESSICA LEVON MCBRIDE**, a non-Indian, did willfully and maliciously set fire to and burn a building, namely, a dwelling located at 4905 North Johnstown Avenue, Tulsa, Oklahoma, a building being utilized by Tracy Elaine Russell, an Indian female.

All in violation of Title 18, United States Code, Sections 1151, 1152, and 81.

**COUNT THREE**  
**[18 U.S.C. § 1512(c)(1)]**

On or about March 17, 2019, in the Northern District of Oklahoma, the defendant, **JESSICA LEVON MCBRIDE**, did corruptly alter, destroy, mutilate, and conceal the body of Tracy Elaine Russell, an Indian female, and did corruptly attempt to do so, with the intent to impair its integrity and availability for use in an official proceeding, by attempting to set fire to Tracy Elaine Russell's body, burn it, and make it unavailable as evidence in the investigation into the killing of Tracy Elaine Russell.

All in violation of Title 18, United States Code, Section 1512(c) (1).


**COUNT FOUR**  
**[18 U.S.C. §§ 1151, 1152, and 81]**

On or about March 20, 2019, within Indian Country in the Northern District of Oklahoma, the defendant, **JESSICA LEVON MCBRIDE**, a non-Indian, did willfully and maliciously attempt to set fire to and burn a building, namely, a dwelling located at 4905 North Johnstown Avenue, Tulsa, Oklahoma, a building containing evidence relating to the homicide of Tracy Elaine Russell.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 81.

CLINTON J. JOHNSON  
Acting United States Attorney

A TRUE BILL

  
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ROBERT T. RALEY  
Assistant United States Attorney

/s/ Grand Jury Foreperson  
Grand Jury Foreperson